



RANDALL C. BUDGE  
randy@racineolson.com

June 10, 2020

Diane Hanian, Secretary  
Idaho Public Utilities Commission  
PO Box 83720  
Boise, Idaho 83720-0074  
[diane.holt@puc.idaho.gov](mailto:diane.holt@puc.idaho.gov)

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IDAHO PUBLIC  
UTILITIES COMMISSION

**Re: IPUC Case No. PAC-E-19-08**

Dear Ms. Hanian:

Enclosed you will find the original and seven (7) copies of *Petition of Monsanto Company for Leave to Intervene*. Please file the same with the Commission's records. If you have any questions, please don't hesitate to call.

Thank you.

Sincerely,

  
RANDALL C. BUDGE

RCB:ts  
cc: Service List

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IDAHO PUBLIC  
UTILITIES COMMISSION

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Thomas J. Budge, ISB No. 7465  
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*Attorneys for Intervenor Monsanto Company, a member of the Bayer group of companies*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF ROCKY MOUNTAIN  
POWER TO CLOSE THE NET METERING  
PROGRAM TO NEW SERVICE &  
IMPLEMENT A NET BILLING PROGRAM  
TO COMPENSATE CUSTOMER  
GENERATORS FOR EXPORTED  
GENERATION**

**CASE NO. PAC-E-19-08**

**PETITION FOR MONSANTO  
COMPANY FOR LEAVE TO  
INTERVENE**

COMES NOW Monsanto Company, a member of the Bayer group of companies, herein called "this Intervenor" and pursuant to Rule 72 of the rules of Procedure of the Idaho Public Utility Commission, and by this Petition asks leave to intervene herein and to appear and participate as a party herein, and as basis therefor states as follows:

- (1) The name and address of this Intervenor is:

Monsanto Company  
James R. Smith  
P.O. Box 816  
Soda Springs, Idaho 83276  
Fax: 208-547-3312  
E-Mail: [jim.smith1@bayer.com](mailto:jim.smith1@bayer.com)

This Intervenor will be represented by:

Randall C. Budge  
Thomas J. Budge  
Racine Olson, PLLP  
P.O. Box 1391; 201 E. Center  
Pocatello, Idaho 83204-1391

and requests that copies of all pleadings and production requests and responses should be provided to the following:

Randall C. Budge  
Thomas J. Budge  
Racine Olson, PLLP  
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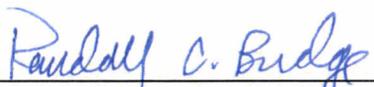
(2) This Intervenor has a direct and substantial interest in this proceeding as a special contract customer of Applicant Rocky Mountain Power and intends to participate in all respects herein as a party as may be required to represent its interests.

(3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission confirm this Intervenor's leave to intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

DATED this 10<sup>th</sup> day of June, 2020.

RACINE OLSON, PLLP

By:   
RANDALL C. BUDGE

**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on this 10<sup>th</sup> day of June, 2020, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

Diane Hanian, Secretary (original and 7)  
Idaho Public Utilities Commission  
P.O. Box 83720  
Boise, ID 83720-0074  
Email: [diane.holt@puc.idaho.gov](mailto:diane.holt@puc.idaho.gov)

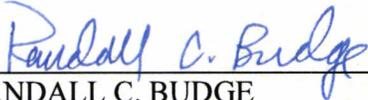
U.S. Mail + Email

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Email

  
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